



Bette G. Hinton, M.D., Director/Health Off
J. Bruce Sarazin, Director of Environment:

County of Yolo

HEALTH DEPARTMENT

Environmental Health

137 North Cottonwood Street, Suite 2400

Woodland, CA 95695

PHONE: (530) 666-8646

FAX: (530) 669-1448

Deficiency Progress Report – Update 2

Report Submitted: March 20, 2009

CUPA: Yolo County Environmental Health

Evaluation Date: August 19 and 20, 2008

Evaluation Team:

Kareem Taylor, Cal/EPA
Mark Pear, DTSC
Jeff Tkach, CalEMA (formerly OES)
Marci Christofferson, SWRCB
Francis Mateo, OSFM

Corrected Deficiencies: 3, 4, 6

Next Progress Report (Update 3) Due: June 22, 2009

Please update the deficiencies below that remain outstanding.

- 1. Deficiency:** The CUPA does not review its Inspection and Enforcement (I and E) plan annually.

Preliminary Corrective Actions: By February 20, 2009, the CUPA will review its I and E plan and update it as needed.

Along with the second progress report, submit the updated I and E plan to Cal/EPA.

CUPA's 1st Update (11-17-08): To be reviewed and submitted as described above.

Cal/EPA's 1st Response: Cal/EPA will review the CUPA's updated I and E plan along with the 2nd progress report.

CUPA's 2nd Update (3-20-09): Review underway, update not complete.

Cal/EPA's 2nd Response: Cal/EPA will review the CUPA's updated I and E plan along with the 3rd progress report.

CUPA's 3rd Update: [Enter Update Here](#)

2. **Deficiency:** CUPA has not reviewed their Area Plan (2001) within the last 36 months and made any necessary changes. This is a carry over deficiency from the CUPA's previous evaluation in 2006.

Preliminary Corrective Actions: By August 20, 2009, the CUPA will conduct a complete review of their Area Plan and make any necessary changes.

Upon completion of the review the CUPA will submit their Area Plan to the State OES for review.

CUPA's 1st Update (11-17-08): To be reviewed and submitted as described above.

Cal/EPA's 1st Response: Please refer to OES's response.

- **OES's Response:** The CUPA shall continue to make progress towards correcting this deficiency.

CUPA's 2nd Update (3-20-09): To be reviewed and submitted as described above.

Cal/EPA's 2nd Response: Please refer to CalEMA's response.

- **CalEMA's Response:** The CUPA shall continue to make progress towards correcting this deficiency. In the next progress report the CUPA shall report on the progress of the Area Plan review as well as an estimated time of completion.

CUPA's 3rd Update: [Enter Update Here](#)

3. **Deficiency:** CUPA has not performed an annual CalARP self audit in compliance with Title 19.

Preliminary Corrective Actions: By November 20, 2008, the CUPA will perform a self audit of their CalARP program which is in compliance with Title 19, Section 2780.5.

By November 20, 2008, the CUPA will submit its CalARP audit to Cal/EPA. The CUPA has the option to include the CalARP self audit elements into their Title 27 self audit.

CUPA's 1st Update (11-17-08): The CalARP audit for FY 07/08 is attached to this update. Future CalARP audits will be included in the annual CUPA self-audit.

Cal/EPA's 1st Response: Cal/EPA and OES consider this deficiency corrected.

4. **Deficiency:** The CUPA has not maintained the state mandated triennial inspection frequencies for CalARP facilities. Of the 12 CalARP facilities in the CUPA's jurisdiction, all but 2 have been inspected within the last 3 years.

Preliminary Corrective Actions: By February 20, 2009, the CUPA will perform inspections on the 2 remaining CalARP facilities. The state mandated inspection frequency for CalARP facilities will be met when the CUPA completes the 2 inspections.

CUPA's 1st Update (11-17-08): The CUPA has inspected the two facilities that were overdue. The City of West Sacramento Bryte Bend WTP (FA0005375) was inspected on 10/2/2008, and Nor-Cal Beverage (FA0000265) was inspected on 10/23/2008. We have one new facility, Raley's Production Bakery (FA0005351) that will be inspected in 2009. All other CalARP facility inspections are up to date until at least November 2009.

Cal/EPA's 1st Response: Cal/EPA and OES consider this deficiency corrected.

5. **Deficiency:** The CUPA is not requiring the facility owners/operators to complete the amended UST forms A, B, and D. The CUPA only requires the forms to be changed if the forms are absent in the file. Some of the plot plans in the files reviewed were absent or did not have all of the required information. Since the new forms gather new information that is required to be collected, it is important for the new forms to be completed when they are amended in regulation. The UST forms are required to be submitted for initial permits and renewal permits and when information changes. The new forms can be provided to facility owners/operators during their annual inspections.

Preliminary Corrective Actions: By September 1, 2009, the CUPA will require all facility owners/operators to complete new UST forms A, B, and D (including plot plans).

CUPA's 1st Update (11-17-08): In October 2008, the CUPA sent out letters to all active UST facilities in Yolo County requesting that the facilities update their forms A, B, and D by December 2008. In addition, we are reminding facilities to update these forms during routine annual inspections.

Cal/EPA's 1st Response: Please refer to SWRCB's response.

- **SWRCB's Response:** The SWRCB evaluator is pleased with the method and progress of the CUPA for correcting this deficiency. Please provide

information on the number of facilities completing the request for updated forms in your next progress report.

CUPA's 2nd Update (3-20-09): Of the 107 facilities that we sent form update requests to, 45 have complied fully, 28 have complied partially, and 34 have not responded at all. YCEH will continue to work towards getting all facilities forms updated, and we will initiate enforcement against those facilities that fail to comply. The Facilities have already been warned.

Cal/EPA's 2nd Response: Please refer to SWRCB's response.

- **SWRCB's Response:** The SWRCB evaluator is pleased with the method and progress of the CUPA for correcting this deficiency. Please continue to report the number of facilities completing the request for updated forms in your next progress report.

CUPA's 3rd Update: Enter Update Here

6. **Deficiency:** During the Hazardous Waste Generator oversight inspection, DTSC found that the CUPA inspector was not familiar with the requirements under HSC 25200.3.1 for laboratories.

Preliminary Corrective Actions: This deficiency was corrected before the end of the inspection.